NOTES OF CASES.

Suicide No Defense to Action on Insurance Policy.—The Validity of the Missouri Statute (Rev. St., 1879, § 5982), which excludes suicide as a defense in suits on life insurance policies unless such suicide was contemplated at the time application was made for the policy, is upheld by the United States Court in Whitfield *v.* Hadley, 27 Supreme Court Reporter, 578, 205 U. S. 489, 51 L. Ed. 895. It was suggested that the statute "merely encourages suicide, and offers a bounty therefor, payable, not out of the public funds of the state, but out of the funds of the insurance company." But the court says that an insurance company is not bound to make a contract which is attended by the results indicated by the statute. If it does business at all in the state, it must do so subject to such valid regulations as the state may choose to adopt.

The enactment of a similar statute in this state is urged at the present session of the legislature.

Toll Bridges.—A toll bridge company authorized to maintain a bridge and to collect tolls for the passage of certain vehicles, automobiles not being mentioned in the charter, is not authorized to collect toll for the passage of automobiles according to the recent decision of the Trial Term of the New York Supreme Court in Mallory *v.* Saratoga Lake Bridge Company, 104 New York Supplement, 1025. The fact that automobiles were not known at the time of the enactment of the charter the court considers to make no difference.

Master's Liability for Servant's Torts.—In Shay *v.* American Iron & Steel Manufacturing Company, 67 Atlantic Reporter, 54, the Pennsylvania Supreme Court holds that a corporation is not liable for damages to a house and injuries to the owner by the negligent shooting by the men employed to take the place of strikers, where the shooting was directed from defendant's premises against a mob, and was not authorized by defendant, and not within the scope of the employment of the persons doing it. The decision is based on the theory that a master is only liable for injuries resulting from the willful conduct of his servants if inflicted within the scope of his authority or employment

Patent Medicine Monopoly.—In yohn D. Park & Sons Company *v.* Hartman, 153 Federal Reporter, 24, the United States Circuit Court of Appeals for the Sixth Circuit holds that a manufacturer of a proprietary medicine is not made immune from the common law forbidding monopolies and unreasonable restraints in trade by the fact that the medicine is manufactured after a secret or private formula, and hence